

ISMAIL J. RAMSEY
United States Attorney
THOMAS A. COLTHURST (CABN 99493)
Chief, Criminal Division

STEPHEN MEYER (CABN 263954)
KEVIN RUBINO (CABN 255677)
Assistant United States Attorneys
150 Almaden Blvd, Suite 900
San Jose California 95113
Telephone: (408) 535-5037
Stephen.Meyer@usdoj.gov
Kevin.Rubino@usdoj.gov

Attorneys for United States of America

RICHARD G. NOVAK (CAB 149303)
richard@rgnlaw.com
Richard G. Novak, A Professional Law Corp
P.O. Box 5549
Berkeley, CA 94705
Telephone: 626-578-1175

CONOR HUSEBY
conor_huseby@fd.org
Admitted Pro Hac Vice
C. Renée Manes, CAB 158528
renee_manes@fd.org
Federal Public Defender's Office
101 SW Main Street, Suite 1700
Portland, OR 97204-3228
Telephone: (503-326-2123

Attorneys for Defendant
DANIEL CHAVEZ

VICTOR J. ABREU
NANCY MacEOIN
Admitted Pro Hac Vice
Federal Community Defender Office
For the Eastern District of Pennsylvania
601 Walnut Street, Suite 540W
Philadelphia, PA 19106
Telephone: (215) 928-1100
Victor_Abreu@fd.org
Nancy_MacEoin@fd.org

Attorneys for Defendant
VICTOR SKATES

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA

v.

DANIEL CHAVEZ, and
VICTOR SKATES,

Defendants.

) CASE NO. CR 15-0285 -JD
)

) **STIPULATION AND ~~PROPOSED~~ ORDER**
) **SETTING STATUS CONFERENCE**

) PROPOSED DATE: JUNE 12, 2023
)

) PROPOSED TIME: 10:30 A.M.
)

1 Plaintiff United States of America and defendants Daniel Chavez and Victor Skates, by
2 and through their respective counsel of record, hereby stipulate and request that this Court
3 schedule a status conference in this matter on June 12, 2023 at 10:30 a.m., for the following
4 reasons:

- 5 1) On April 26, 2023, this matter was randomly reassigned from the docket of Judge
6 Breyer to the docket of this Court.
- 7 2) There is not, presently, a trial date scheduled in this matter, but the parties are
8 prepared for the Court to set a trial date. The defendants recently filed in advance of
9 the April 26, 2023 status conference before Judge Breyer a “Joint Defense Statement
10 on Trial Scheduling” (Doc. No. 996), which proposed that the estimated three to four
11 month trial be set to commence on September 2, 2024.
- 12 3) Counsel for Mr. Chavez and Mr. Skates are presently working on a proposed pretrial
13 scheduling order which they will provide to counsel for the government prior to June
14 12, 2023. Once a trial date is set by the Court, counsel will meet and confer
15 concerning pre-trial scheduling issues. No later than 30 days after the June 12, 2023,
16 the parties will file with this Court either a jointly proposed scheduling order or the
17 parties’ alternative proposals.

18 IT IS SO STIPULATED.

19 DATED: May 4, 2023

Respectfully submitted,

20 ISMAIL J. RAMSEY
21 United States Attorney

22 /s/ Stephen Meyer
23 STEPHEN MEYER
24 KEVIN RUBINO
25 Assistant United States Attorneys

26 Attorneys for the UNITED STATES
27
28

1 /s/ Victor J. Abreu
VICTOR J. ABREU
2 NANCY MacEOIN

/s/ Richard G. Novak
RICHARD NOVAK
CONOR HUSEBY
C. RENÉE MANES

3 Attorneys for VICTOR SKATES

Attorneys for DANIEL CHAVEZ

4 ~~PROPOSED~~ ORDER

5 For the reasons stated in the parties' stipulation, and for good cause shown, the Court
6 hereby schedules a status conference in this matter for 10:30 a.m. on Monday June 12, 2023.
7 Mr. Chavez and Mr. Skates, who are both in the custody of the United States Marshals' Service,
8 shall be present.

9 PURSUANT TO STIPULATION, IT IS SO ORDERED.

10
11 Dated: May 10, 2023



HONORABLE JAMES DONATO
United States District Judge